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ATTORNEYS FOR DEFENDANTS
TRIANGLE CROSS RANCH, LLC
GERALD E. SCHNEIDER; MICHAEELEEN P. SCHNEIDER
MATHEW SCHNEIDER; MARK SCHNEIDER and THOMAS GEORGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

ANDREW SCAVUZZO and H.I. as Parent and Next)
Friend of T.I., on behalf of themselves and all similarly)
situated persons,)

Plaintiffs,)

v.)

TRIANGLE CROSS RANCH, LLC, a Wyoming)
Limited liability corporation; **GERALD E. SCHNEIDER;**)
MICHAEELEEN P. SCHNEIDER; MATTHEW)
SCHNEIDER; MARK SCHNEIDER; THOMAS)
GEORGE; and the SOCIETY OF OUR LADY OF)
THE MOST HOLY TRINITY, a Texas corporation.,)

Defendants.

Case No. 1:20-CV-215-SWS

**THE TCR DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED
COMPLAINT**

Triangle Cross Ranch, LLC ("TCR, LLC"), Gerald Schneider, Michaelleen Schneider,
Matthew Schneider, Mark Schneider, and Thomas George (collectively, the "TCR Defendants"),

through their attorneys White and Steele, P.C., hereby move under Fed. R. Civ. P. 12(b)(6) to dismiss certain claims with prejudice against the TCR Defendants for failure to state a claim upon which relief may be granted. The TCR Defendants have submitted a written brief in support of this Motion, incorporated here by reference. TCR Defendants move for dismissal based on the following grounds:

1. Plaintiff Scavuzzo fails to make a single factual allegation to support his claims against TCR, LLC, Michaelleen Schneider, Matthew Schneider, and Mark Schneider and therefore those claims are deficient as a matter of law. (Counts 1, 2 and 3).

2. Plaintiff T.I.'s fails to make a single factual allegation to support his claims against Michaelleen Schneider, Matthew Schneider, Mark Schneider, and Tom George and therefore those claims are deficient as a matter of law. (Counts 1, 2 and 3).

Dated this 11th day of May, 2022.

WHITE & STEELE, P.C.

/s/ John C. Matthews

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed on May 11, 2022 with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

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For White and Steele, P.C.